NO PLACE TO CALL HOME

How Housing Policies & Criminalisation Impact Migrant Sex Workers

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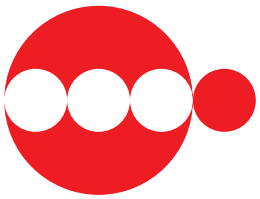

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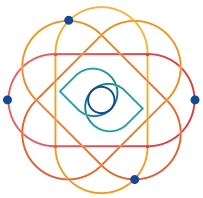

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List of abbreviations

Art.	Article
EC	European Commission
ECtHR	European Court of Human Rights
Eurodac	European Dactyloscopy
EP	European Parliament
ESWA	European Sex Workers Alliance
FOSTA	Allow States and Victims to Fight Online Sex Trafficking Act
HICP	Harmonised Index of Consume
PICUM	Platform for International Cooperation on Undocumented Migrants
NGO	Non-Governmental Organisation
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
UNHRC	United Nations Human Rights Council
SESTA	Stop Enabling Sex Traffickers Act
TFEU	Treaty on the Functioning of the European Union
OHCHR	Office of the High Commissioner for Human Rights

INTRODUCTION

This report builds upon ESWA's ongoing work regarding housing access for migrant sex workers, drawing on grassroots observations that highlight the daily challenges these individuals encounter in securing adequate and dignified housing. This report aims to provide a conceptual framework, empirical evidence, and policy recommendations to enhance the understanding of, and responses to, the housing challenges faced by migrant sex workers across Europe.

The report is based on primary data collected by seven ESWA member organisations across five countries, each offering a distinct perspective: Red Umbrella Athens (RUA) in Greece; Sex Workers Alliance Ireland (SWAI) in Ireland; Sex Workers Intersectional Peer Education (SWIPE), Ombre Rosse and Comitato per i Diritti Civili delle Prostitute (CdCP) in Italy; Sex Workers Against Violence & Exploitation (SAVE) in the Netherlands; and the English Collective of Prostitutes (ECP) in the United Kingdom.

Stigma, discrimination, and criminalisation, as have been extensively documented, create significant barriers to sex workers' ability to secure a stable livelihood and achieve overall well-being (Amnesty International, 2016). Sex workers frequently experience violence (West & Horn, 2021), as well as exclusion, isolation, and, in some cases, imprisonment — or, for undocumented migrants, deportation — simply because their source of income is deemed 'inappropriate' or 'immoral' by prevailing societal norms (Mac & Smith, 2018). Furthermore, they often experience compounded forms of discrimination based on racialisation, residency status, class, gender, and other intersecting factors.

As a result, **access to stable and adequate housing — including basic amenities such as electricity, water, and heating, as well as a safe environment that fosters security, dignity, and well-being — remains a significant challenge for many sex workers around the world, and across Europe.** Beyond the issue of access, maintaining housing is just as precarious, as hostility from landlords and neighbours, coupled with the constant threat of eviction, often leads to displacement and chronic housing instability. **Systemic housing exclusion, driven by the pervasive social stigma attached to sex work, exacerbates these challenges. This hostile environment is reinforced by legal frameworks that rarely recognise sex work — or those engaged in it — as legally legitimate. Even when they do, they often impose numerous barriers.** As a result, sex workers face limited opportunities to secure affordable and legal housing that meets their needs.

Undocumented migrants face an even harsher reality. Their precarious immigration status and racialisation expose them to a greater risk of eviction,

police violence, and the spectre of deportation. The situation is particularly dire for parents — especially single mothers — who may face the potential loss of child custody. These threats drastically reduce the likelihood of migrant and racialised sex workers speaking out, as the consequences they face are more severe than those faced by sex workers with secure documentation or tenancy agreements. Overall, cisgender sex workers tend to be relatively less exposed than transgender sex workers, and white sex workers are safer than workers of colour (Mac & Smith, 2018). Racist and transphobic biases, combined with the stigma against sex work, create a hierarchy of privilege and oppression.

Amid this context of widespread marginalisation, housing for migrant sex workers should be a primary concern for policymakers at all levels, from international to local. The right to adequate housing and a sufficient standard of living, recognised as a fundamental human right by the United Nations Human Rights Council, is enshrined in the 1948 Universal Declaration of Human Rights. Additionally, access to affordable, decent, sustainable, inclusive, and resilient housing is a fundamental principle of the EU Pillar of Social Rights (European Commission, 2023a), aligning with Goal 11 of the UN 2030 Agenda for Sustainable Development (UN General Assembly, 2015).

Housing becomes even more critical when viewed as a 'gateway right' — a fundamental necessity that enables access to other essential resources and opportunities, such as healthcare, personal development, and family stability. Conversely, inadequate housing pushes sex workers into increasingly exploitative environments, heightening their exposure to risks posed by various actors, including clients, landlords, stalkers, law enforcement officers, and third parties. Exacerbated energy poverty, caused by rising housing costs and energy prices, further compounds these challenges. Without stable and adequate housing, sex workers remain vulnerable to life-threatening conditions, facing persistent exposure to physical, emotional, and sexual violence.

To address the complex issues surrounding migration, sex work, and housing, this report is structured into four sections. The first section examines relevant legislation, policy recommendations, and academic research on these topics, primarily within the European context, and includes specific references to the five countries central to this study. The second section outlines the research methodology employed in the study. Key findings from primary data collected by participating ESWA member organisations across the five focus countries are presented in the third section. Building on these findings, the report then explores good practices identified through the research, as well as those implemented in other contexts, with a particular emphasis on self-management and self-organisation initiatives. Finally, the report concludes with a set of actionable recommendations.

MIGRATION, HOUSING POLICIES, AND SEX WORK IN EUROPE: AN OVERVIEW

A. Migration

Examining migrant sex workers' access to housing and the inadequate conditions they face requires a broader analysis of migration and the specific challenges migrants encounter within the European context, as well as the legal frameworks that shape these issues.

Although migration rates and demographics differ across the countries included in this study, the majority of migrants (over 50%) in all cases originate from non-EU countries. Migration saw a notable increase in 2015, followed by a second surge starting in 2020. Among the focus countries, Italy has the highest absolute number of non-EU migrants (Eurostat, 2024). To address rising migration, European countries have implemented legislative measures since the 1990s to regulate immigration and strengthen the external borders of the European Union and the Schengen Area. Since 2015, several member states have also reinstated internal border controls, citing concerns about terrorism and irregular migration.

Against this backdrop, the living conditions of migrants have not been a priority. According to a report by Equinox Initiative for Racial Justice, a people of colour-led coalition advocating for rights and justice for all people in the European Union, recent EU provisions offer little insight into the reasons people migrate to Europe and, more importantly, the treatment they receive upon arrival. Furthermore, the EU regulatory framework fails to address the state-sanctioned violence and human rights abuses now emblematic of 'Fortress Europe' — a term used to describe the EU's militarised approach to border control, designed to prevent, regulate, and criminalise movements into and within member states (Hashmi & Chander, 2022).

The situation is even worse for undocumented migrants. The EU Facilitation Directive (Council of Europe, 2002) extends beyond the UN Protocol on Migrant Smuggling (UN General Assembly, 2000). Unlike the UN Smuggling Protocol, which requires financial or other material benefit for migrant smuggling to be considered a crime, EU legislation retains a broad definition of smuggling, where financial benefit is not a core element of the basic crime but an aggravating circumstance. This interpretation of facilitating illegal migration as smuggling has serious consequences, leading to situations known as the criminalisation of solidarity. Civil society organisations, property owners, and those providing

accommodation to undocumented migrants risk criminal liability for facilitating irregular stay. The implementation of the Facilitation Directive is perceived as contributing to the social exclusion of both irregular and regular migrants in many EU member states, creating a significant chilling effect.

In November 2023, the European Commission proposed a revision of the Facilitation Directive to modernise and strengthen the existing legal framework (European Commission, 2023b) While the Commission also aims to narrow the problematic definition that has led to the criminalisation of thousands of migrants and those acting in solidarity with them, the new proposal for a revised Facilitation Directive not only fails to prevent this trend but is likely to create new grounds for criminalisation (PICUM, 2024). At the time of finalising this report, the legislative process was still ongoing.

The most significant recent policy shift is the approval of the New Pact on Migration and Asylum, which entered into force in 2024. After years of controversy and debate, Directive 2024/1346 introduces revised rules for the reception of asylum seekers, formally aiming to improve living conditions and standardise reception practices across member states (European Union & Council of Europe, 2024). While these measures include provisions for housing conditions, they introduce few substantive changes compared to the previous Directive 2013/33/EU (European Union, 2013). Article 20 of Directive 2024/1346, which replaces Article 18 of the 2013 Directive, sets out updated standards for material reception conditions. However, rather than introducing genuinely new standards — at least concerning housing — the new directive modifies only two points. First, it expands the definition of "housing offering an adequate standard of living" to include "premises used for the purpose of housing applicants during the examination of an application for international protection", in addition to existing accommodation centres or private housing. Secondly, Article 20 § 5 of the directive stipulates the provision of "separate sanitary facilities" and a "safe place" in reception centres for women and their minor children. This latter provision is particularly perplexing, as the protection of migrant women in reception centres appears to rely on the availability of separate toilets and showers, as well as on the ambiguity of the undefined concept of a 'safe place'. Moreover, Article 20 § 4 only requires a commitment to ensure the prevention of assault, violence, or discrimination 'as far as possible', offering no concrete guarantees or enforcement mechanisms.

These rather weak provisions exist within a context of severe violations of even the minimum conditions for decent living and life itself. Since 1993, UNITED for Intercultural Action has documented 60,620 deaths of refugees and migrants due to the restrictive policies of Fortress Europe. **A significant number of these deaths occurred in detention and expulsion centres, directly calling into question the notion of a safe place and an adequate standard of living in such facilities** (UNITED for Intercultural Action, 2024).

Each EU member state was required to introduce its national implementation plan for the new pact by December 2024. However, as implementation is in its early stages, it is too soon to fully assess its impact on migrants' living conditions, particularly regarding housing. Key concerns remain about how these policies will be enforced at the national and municipal levels, especially given the growing trend of restrictive local ordinances targeting migrants' access to public services or social housing. Additionally, the interplay between EU-level regulations and national legal frameworks may create inconsistencies, further complicating migrants' ability — especially those engaged in informal or criminalised economies such as sex work — to secure safe and stable housing. **This evolving legal landscape underscores the urgency of continued monitoring and advocacy to ensure that housing policies align with human rights standards and do not exacerbate existing vulnerabilities.**

This broader framework is further complicated by the rise of nationalist, anti-immigration policies at the local level, which have shaped both legislative measures and public discourses. The Italian case, marked by increasingly restrictive immigration laws and securitisation policies, exemplifies this trend, as does the United Kingdom's exit from the EU, which has significantly altered migration dynamics and the legal status of many non-EU residents. **These national policies, often framed as measures to protect domestic labour markets and national security, contribute to a hostile environment for migrants, reinforcing precarious living conditions and limiting access to stable housing, even after years of residency.**

The problem is therefore at least twofold: **immigration laws and the reception system create hostile and often life-threatening conditions for newly arriving migrants in Europe, and long-term migrants frequently find themselves trapped in permanent precarity, with limited opportunities for social and economic mobility.**

B. Housing

While presenting a unified picture of housing policies across the five countries examined in this study is difficult — given that housing remains largely a matter of national and local governance — certain common trends can be identified. First, over the past two decades, governments have increasingly withdrawn from direct intervention in housing markets, favouring liberalisation and privatisation. This shift has reduced public housing provisions and rent controls, making access to housing more dependent on market forces. Second, recent policy decisions, combined with broader political and economic factors, such as the war in Ukraine, have triggered an energy crisis, significantly raising the cost of living. Housing expenses, particularly electricity, heating, and utilities, have been among the most affected, deepening housing insecurity for marginalised populations. Third, these challenges are further exacerbated by rising mortgage interest rates and urban transformation processes, including gentrification, urban renewal, and tourism-driven real estate speculation. Across many European cities, these forces have reshaped urban landscapes, pushing low-income and marginalised communities — including sex workers — to peripheral areas and reinforcing socio-spatial exclusion (Hubbard, 2004; Hubbard *et al.*, 2007; Sanders-McDonagh, 2016).

Despite the increasing burden of housing costs on households, house prices are not adequately reflected in the Harmonised Index of Consumer Prices (HICP), nor are they consistently factored into inflation assessments. This omission is particularly problematic, as housing-related expenses constitute the largest share of financial outflows for many households (Vincze *et al.* , 2024).

In response to these pressures, states have introduced and continue to discuss various measures to mitigate the effects of rising housing costs. However, the effectiveness of these policies varies widely across national contexts, and their long-term impact remains to be systematically evaluated. Addressing these housing challenges requires not only short-term financial relief but also a broader reconsideration of housing policies that prioritise affordability, security, and inclusivity.

In this context, the migrant population is among the most affected. The right to adequate housing is enshrined in Article 5 of the International Convention on the Elimination of All Forms of Racial Discrimination, which guarantees equality in housing access without discrimination based on race, colour, or national or ethnic origin. However, in practice, **migrants — particularly those with low incomes — face significant barriers in the private housing market.** The 2025 Report of the Special Rapporteur on Adequate Housing (UN Human Rights Council, 2025) notes that when migrants do manage to secure private rentals, they often face high rents and demanding advance payment requirements. Without adequate legal protections, they are vulnerable

to predatory practices by landlords and the fluctuations of the housing market. Late or non-payment of rent can lead to eviction, placing migrants at a high risk of homelessness or subjecting them to exploitation and abuse to avoid eviction (para 44). The report also emphasises that undocumented migrants' exclusion from social protection mechanisms, such as subsidized housing and income security, compounds the risks they face, including in-work poverty, destitution, violence, exploitation and homelessness. Such challenges are intensified in countries where landlords are penalized for renting to migrants without valid residence permits (para 87). In this context, according to the European Union's Agency for Fundamental Rights (FRA, 2016), Cyprus, Denmark, Estonia, Greece and Lithuania have legal provisions that explicitly punish landlords for renting accommodation to migrants in an irregular situation, although in Estonia and Lithuania the sanction is only a fine. In addition, based on the rules on facilitation of stay, landlords who rent accommodation to migrants in an irregular situation may also risk a fine and/or imprisonment under the national law of 11 Member States. In another seven EU Member States, the penalty is a fine. In aggravated cases, the penalty can be imprisonment. In the 2025 report, the UN Special Rapporteur on Adequate Housing points out that this not only lowers housing standards but also fosters suspicion towards migrants, leaving undocumented people to choose between substandard, high-priced rental accommodations or be at risk of forced evictions, home demolitions and homelessness. Undocumented migrants are usually barred from access to complaint mechanisms in private housing markets or emergency accommodations. This creates a vicious cycle where inadequate housing contributes to their broader social and economic exclusion (para 87).

In this context, the Second European Union Minorities and Discrimination Survey (FRA, 2017) highlights the widespread marginalisation faced by racialised individuals in accessing housing, with Italy and Austria reporting the highest rates of perceived discrimination. Although Germany falls outside the scope of this study, data from its Federal Anti-Discrimination Agency (2024) indicate the magnitude and geographical scope of the issue. *"According to a representative survey commissioned by the Federal Anti-Discrimination Agency, approximately 15% of respondents who had searched for a flat in the past 10 years experienced discrimination based on race, ethnicity, or origin. This affects people with a migrant background in particular: one in three persons with a migrant background looking for a flat (35%) reported racial discrimination. Often, a foreign-sounding name is enough to prevent an invitation to a flat viewing. Alarmingly, openly racist flat advertisements remain a part of everyday life"* (Federal Anti-Discrimination Agency, 2024). Similar findings have been reported in the Netherlands (Büken, Jathavethan & Insinger, 2022). Scholars (El Moussawi, 2023; Robinson, 2024; Dotsey & Chiodelli, 2021) and grassroots movements across various countries have extensively documented the systemic struggles faced by migrants and racialised individuals in securing accommodation. Given the barriers to both private rental markets and public housing, both documented and undocumented migrants often respond by relying on family members or diaspora networks for shelter. In countries such as Italy and the

United Kingdom, asylum seekers are accommodated separately from those receiving mainstream benefits. They are often housed in hotels or other venues where substandard conditions are widespread: reports of mould, rotting furnishings, dirty bedding, broken beds, mice, and bed bugs are common (Medlicott, 2023). **This makes the reception system itself a key and early mechanism of segregation.**

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Although housing policies fall under the competence of individual states or regional governments, various treaties and recommendations for minimum standards exist at both global and European levels. For example, the International Covenant on Economic, Social and Cultural Rights of the United Nations (UN General Assembly, 1966) provides a framework for housing rights that states are expected to uphold. These international commitments establish minimum housing standards, including access to adequate food, clothing, and shelter, as well as the continuous improvement of living conditions, urging member states to ensure adequate housing for all individuals regardless of national or regional competencies.

Article 31.1 of the European Social Charter stipulates that to ensure the effective exercise of the right to housing, states "undertake to take measures designed to promote access to housing of an adequate standard" (Council of Europe, 1996). According to the European Committee of Social Rights, "housing of an adequate standard" must meet three key criteria:

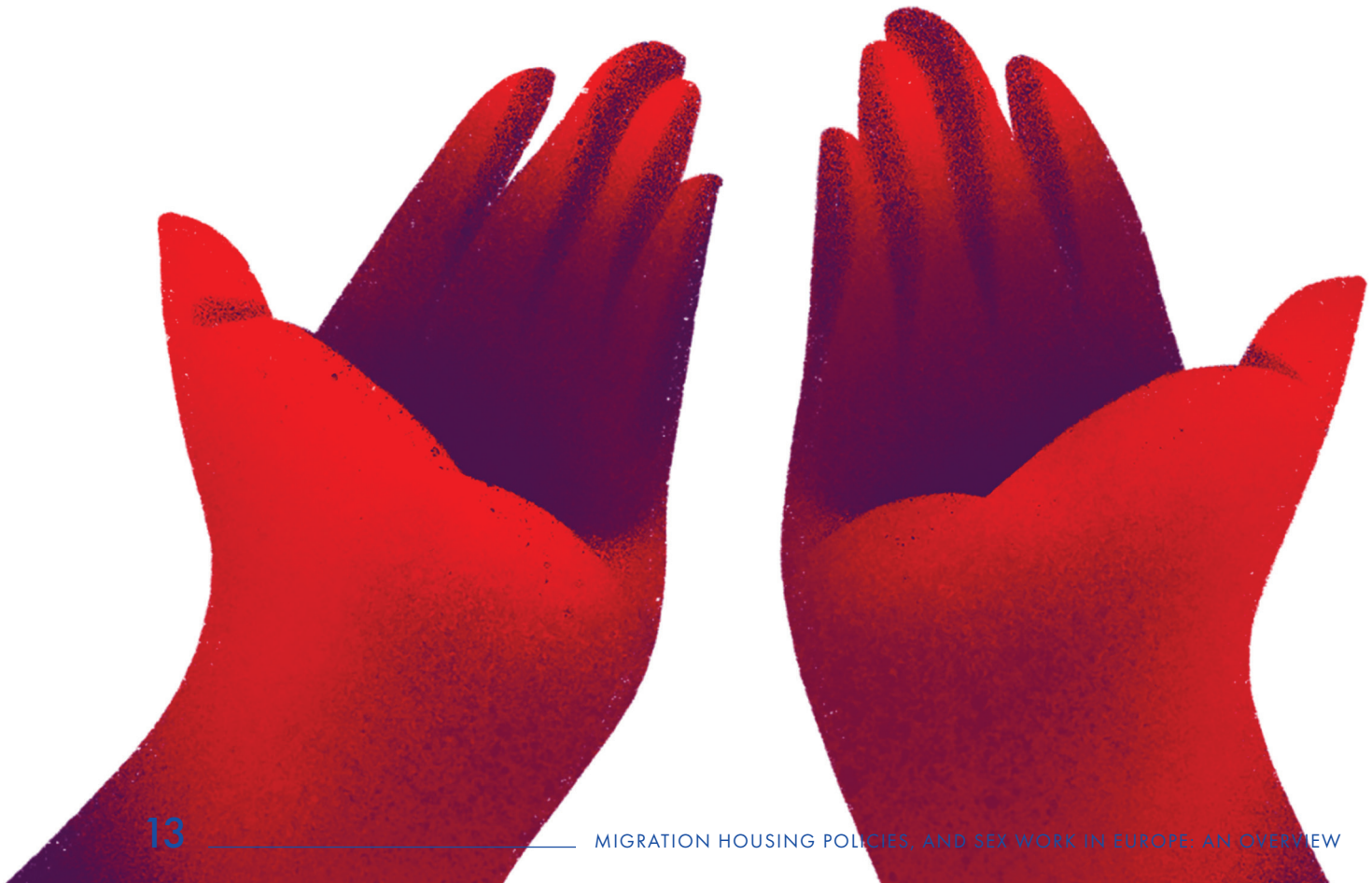
1. A dwelling that is safe from a sanitation and health perspective, possessing all basic amenities, including water, heating, waste disposal, sanitation facilities, and electricity, while limiting exposure to hazards such as lead or asbestos.

2. A dwelling that is not overcrowded, ensuring adequate space for the household composition.

3. A dwelling with secure tenure protected by law (Aldanas et al., 2023).

More recently, the European Parliament resolution of 21 January 2021 called on the European Commission and member states to recognise access to adequate housing as a fundamental right. It defines adequate housing as including access to essential utilities (such as energy), a sense of well-being, as well as secure and sustainable living conditions. The resolution highlights that access to affordable, decent housing is especially challenging for vulnerable groups, including migrants, refugees, asylum seekers, racial minorities, and LGBTQIA+ individuals, who often face compounded, intersecting forms of discrimination.

Currently, limited information is available on the specific housing conditions of sex workers (Diatlova, 2017; Su *et al.*, 2017; Hubbard & Prior, 2013; Hassan *et al.*, 2021; Morpurgo, 2024), with some additional research focusing on cases of homelessness among sex workers (McNaughton & Sanders, 2007; Macon & Tai, 2022; Kattari & Begun, 2017), leaving significant gaps in understanding their broader housing realities. Evidence shows how undocumented migrant sex workers are frequently excluded from public housing and emergency accommodation services, which are available only to those with legal residence permits. In the private housing market, they are often subjected to exploitation, as landlords charge inflated prices for substandard accommodations due to their precarious legal status (ICRSE, 2016; Platt *et al.*, 2018). This lack of data underscores the importance of the study underpinning this report.



C. Sex work

Different approaches to the regulation of sex work exist across Europe, generally aiming to either contain sex work or work towards its eventual abolition. In both cases, sex work is framed as undesirable, leading to the stigmatisation of sex workers, who are criminalised, victimised, or denied equal status compared to other workers. While various regulatory models, such as criminalisation or legalisation, can sometimes produce similar outcomes, particularly in reinforcing the marginalisation of more visible forms of sex work, it remains crucial to provide a nuanced overview of national regulations in the countries considered in this report, including insights into local-level policies that shape sex workers' experiences and how they impact their housing conditions. On a broader scale, European and international legislation and recommendations often present conflicting perspectives. On the one hand, a pragmatic, harm-reduction approach seeks to respect individuals' choices, rights, and lived experiences. On the other hand, there is a persistent 'abolitionist' stance — driven by ideological and utopian aspirations — advocating for the complete eradication of sex work. **Amid these tensions, full or partial criminalisation remains the dominant legal approach to sex work across Europe** (Krüsi *et al.*, 2021). Against this backdrop, the following section will provide a brief overview of how sex work is regulated in the five countries examined in this study.

In **Greece**, sex work is partially criminalised, with strict regulations imposed since 1999. Sex workers must obtain a personal license, meet a series of legal requirements, undergo regular health screenings, not be drug users, and operate exclusively in licensed brothels located away from schools and residential areas (Oliveira *et al.*, 2020; NSWP, 2019). **These stringent requirements create a sharp divide between those who can comply with the law and those who cannot, effectively forcing many — especially undocumented migrants — into precarious and unregulated conditions**, a trend particularly visible during the COVID-19 pandemic. Migrant sex workers, often unable to obtain the necessary documentation for licensing, face compounded marginalisation due to legal barriers, racialisation, and pervasive stigma. As a result, they are disproportionately affected by housing insecurity, exclusion from formal rental markets, and heightened vulnerability to exploitation.

Additionally, Greek law prohibits sex workers from working together and sharing the same building or apartment — a provision dating back to the 1950s, which is also found in other jurisdictions such as the United Kingdom and Italy. This law was originally introduced as part of an international anti-trafficking campaign aimed at preventing exploitative brothel relationships. If a brothel is located in an apartment building, the consent of all co-owners and tenants is required. In practice, however, internal condominium regulations often prohibit such use. Furthermore, listed buildings cannot legally function as brothels, although this rule is frequently violated, particularly in Greek cities with well-known historical centres (Michalakea, 2024).

Ireland presents a distinct case regarding the moralistic approach to prostitution and housing throughout its history. Following the Criminal Law Amendment Act of 1885, workhouses known as Magdalene Laundries were established as state-sanctioned prisons for 'fallen' women — a term that typically referred to sex workers and unmarried pregnant women. These institutions were purportedly housing and charity solutions for 'fallen women' but in reality, they were sites of slave labour and harsh, degrading punishments. The last Magdalene Laundry, run by the Religious Sisters of Charity, closed in 1996 (Berry & Frazer, 2021). In 1993, Ireland enacted the Criminal Law (Sexual Offences) Act, which criminalised sex workers working from the same venue: "Act 1993 criminalises knowingly renting to sex workers, [making] renting property difficult for sex workers [and] contributing to a precarious housing situation. Additionally, the law criminalises sex workers working together for reasons such as safety and potentially criminalises sex workers living with roommates, partners or family, especially if the sex worker is contributing to rent or utilities" (Berry & Frazer, 2021, p. 879).

In 2017, Ireland further regulated sex work by implementing a neo-abolitionist framework. While selling sex is not openly criminalised, purchasing sex was made illegal. The introduction of the Swedish model in 2017, combined with the 1993 regulation penalising solidarity among sex workers, is also referred to as the **'End Demand' model**. This model assumes that criminalising the purchase of sexual services will result in the decrease of the number of clients and, consequently, the number of people

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"supplying" sexual services (D'Adamo & Manley, 2021). However, the model has failed to achieve its ideological goal of improving sex workers' conditions, providing them with access to harm reduction measures, and facilitating their exit from sex work. This failure is evidenced by Ruhama's 2019 report in Ireland, which highlights numerous barriers to exiting sex work, including poverty, a lack of viable alternatives, immigration status, homelessness and precarious housing, a lack of formal educational qualifications, psychological trauma, post-traumatic stress disorder, and isolation.

Italy follows an abolitionist approach in which sex work is neither criminalised nor regulated as a legitimate profession. Consequently, sex work is not legally recognised as work. Moreover, associated activities such as induction, aiding and abetting, and exploitation are illegal. The definition of what these 'activities' are is vague and subject to jurisprudential interpretation. **These legal ambiguities are often to sex workers' detriment rather than in their favour**, as they can lead to the criminalisation of sex workers who work together on the same premises. This is particularly significant given the cultural context in which these laws operate, i.e. one that remains deeply stigmatising towards sex workers and affects every aspect of sex workers' lives, including their access to adequate housing. Furthermore, although sex work is not illegal, from the late 1990s and early 2000s, local administrators — influenced by an increasingly prevalent rhetoric of decorum aimed at regulating bodies and spaces on a 'moralising' basis — sought to curb outdoor (primarily street-based) prostitution through the approval of **local decrees**. Since they could not explicitly ban the sale of sexual services, they issued ordinances prohibiting the wearing of 'revealing' clothing or loitering near schools and churches. These ordinances not only have a strong repressive character but also a pronounced gendered impact, as they disproportionately target cis or trans women sex workers, restricting their ability to present themselves freely in public spaces and forcing them into more hidden and unsafe locations.

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In the **Netherlands**, the primary focus is oriented towards **confining sex work**. sex work itself was never illegal, but the 1911 Act against Immorality prohibited the running of brothels and pimping, although the ban "was quickly ignored and led to noncompliance, [...] after which a period of laissez-faire began." (Post, Brouwer & Vols, 2019). In 2000, the ban on brothels was lifted in the Criminal Code, allowing for the regulation of the sex industry under administrative and labour law, and recognizing sex work as legitimate labour. Since then, Dutch law has permitted sex businesses to operate legally, provided they do so with the consent of all involved adult persons above the age of 18. At the same time, 'undesirable forms of prostitution,' such as the exploitation of forced prostitution and of minors, became more strictly penalised, as did clients of minors. The current Article 273f of the Criminal Code criminalises coercion, the (threat of) violence, deceit, or abuse of authority in both recruitment and work conditions. **The Migrant Workers Act prohibits the issuance of work permits to non-EU citizens for employment in the sex industry.** When the ban on brothels was lifted, this restriction was justified by the then Minister of Justice, who argued that foreign prostitutes lacked "the mental maturity to make deliberate decisions and oversee the consequences," and were therefore considered victims by definition (Haveman & Wijers, 2001).

In the majority of cities, sex businesses are regulated through licensing systems. Brothels are subject to municipal bylaws, requiring adherence to certain standards in city planning, hygiene, fire safety, and management (e.g. no forced drinking, no unsafe sex, no minors, and no undocumented workers). Violations can result in brothel closures, a more effective sanction than criminal prosecution (Wijers & Van Doorninck, 2009). However, despite this apparent openness, significant limitations persist. **Street-based sex work, while not regulated under national (criminal) law, is often prohibited by local ordinances.** Additionally, **sex workers who want to apply for a business bank account are now often refused due to perceived money laundering risks** (Netherlands Chamber of Commerce, n.d.), hindering their ability to secure stable housing. Furthermore, while home-based sex work is nominally legal, sex workers must first contact their municipality to find out if they are allowed to work in their homes. **Most municipalities prohibit sex work at home,** forcing sex workers into brothels or clandestine operations.

In the **United Kingdom**, sex work has been the target of several, and oftentimes inconsistent, pieces of legislation (Pitcher & Wijers, 2014). Except for Northern Ireland, which employs a neo-abolitionist model, commercial sex is partially criminalised. While engaging in sex work is legal, **the means used by sex workers to contact clients, such as solicitation in public places and advertising sexual services, including putting cards in phone boxes, are illegal.** Additionally, **mutual work organisation among sex workers is also outlawed. This includes sharing flats.** The English Collective of Prostitutes (ECP) reports numerous cases where these laws impede access to viable and sustainable housing, while increasing the risk of eviction (ECP, 2020). Similarly, the risk of being displaced by the police or becoming homeless further exacerbates sex workers'

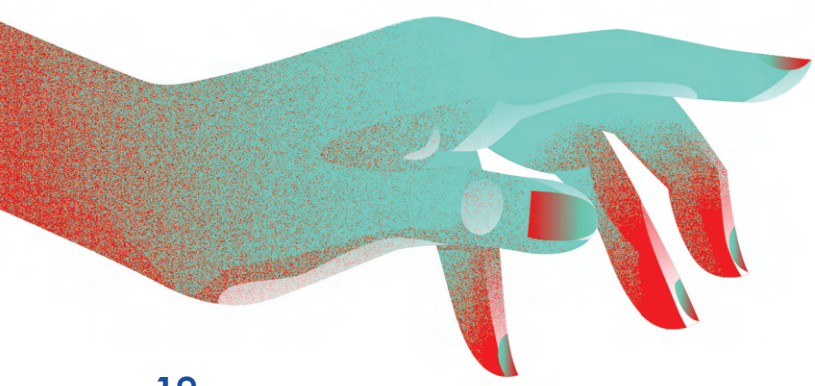
vulnerability to exploitation and violence (Walker *et al.*, 2024, ICRSE 2020, 2021). The situation further deteriorated for migrant sex workers after Brexit. Since sex work isn't recognised as work in the UK, many people lack documentation that would help establish a right to stay in the country, leading to increased arrests and deportations following the referendum in 2016 (ECP, 2020). Homelessness, one of the primary reasons for engaging in sex work as a last resort to secure shelter and food (Balfour & Allen, 2014), also intensifies the struggle for resources.

Many European countries are considering neo-abolitionist models of regulation. Discussions on the criminalisation of clients often assume that all paid sexual activity constitutes violence, sexual exploitation, or even human trafficking. However, international law lacks clear definitions for 'exploitation' and 'sexual exploitation' (ICRSE, 2021). Furthermore, this conflation obscures genuine cases of exploitation and violence, denies survivors access to tailored support, and hinders the identification of exploitative third parties (ESWA, 2022, p. 1).

This legal approach indirectly affects housing access for migrant sex workers. Examples of this pattern are present both in Europe and worldwide. For example, the SESTA/FOSTA[1] laws, enacted in the United States in 2018 with the intention to combat human trafficking, have primarily targeted sex work by shutting down websites, deplatforming users, and restricting online advertising (Musto *et al.*, 2021). These measures have led to significant financial instability, increased job and housing insecurity, and heightened risks to safety and health (Musto *et al.*, 2021). Similarly, as seen in the Netherlands, strict regulations can create significant barriers to sex workers' well-being and self-determination.

In contrast, Belgium became the first European country to decriminalise sex work in March 2022. This landmark reform followed the COVID-19 crisis, which exposed the severe social injustices faced by sex workers, particularly in a country with high living standards (UNAIDS, 2022, p. 156). Previously, Belgium's partial Swedish model impeded sex workers' access to housing. Simply renting an apartment was classified as 'pimping,' making it a criminal offense. As a result, sex workers were either forced to pay exploitative rents to compensate landlords for perceived legal risks or were denied housing altogether (André *et al.*; 2022).

1 FOSTA (Allow States and Victims to Fight Online Sex Trafficking Act); SESTA (Stop Enabling Sex Traffickers Act).



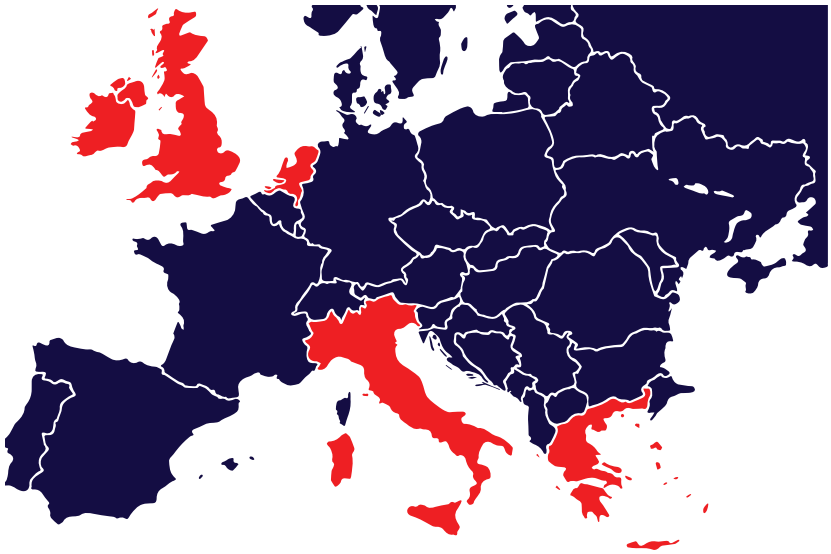
Criminalisation and strict regulatory policies significantly impair migrant sex workers' ability to secure safe and stable housing, increasing their vulnerability to exploitation. Many of these regulatory models, though ostensibly designed to protect sex workers, often have unintended — yet severe — harmful consequences. Shared living spaces, intended for safety or to reduce costs, may be misconstrued as illegal brothel keeping or evidence of trafficking or third-party exploitation, leading to police raids and evictions (ICRSE, 2016). Ultimately, rather than providing protection, such laws exacerbate the precarious conditions faced by sex workers, particularly those from migrant backgrounds, forcing them to rely on brokers and landlords willing to take on the risks of renting to them (such as being punished for profiting from prostitution). Such situations, where migrant (racialised, trans) sex workers have no viable alternative but to accept the terms of such intermediaries, can amount to exploitation.

METHODOLOGY

This research was conducted by the European Sex Workers' Rights Alliance in collaboration with seven national member organisations across Greece, Ireland, Italy, the Netherlands, and the United Kingdom. The methodology is based on the feminist participatory action research framework (ESWA, 2024), which promotes structural change and involves affected communities at all stages of the research process. Sex worker-led and sex worker rights organisations were involved in the design of the survey and data collection, including desk research and data analysis.

The research findings are based on semi-structured, in-depth interviews with sex workers, conducted primarily by peer researchers within these European countries.

The sex worker-led organisations involved in this study operated under various regulatory frameworks — ranging from the Swedish model to various forms of partial criminalisation, partial regulation, or formal regulation. The aim was to highlight the specific challenges faced by migrant sex workers under these different legal systems.

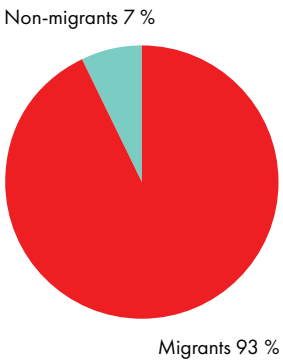


This research was conducted in:

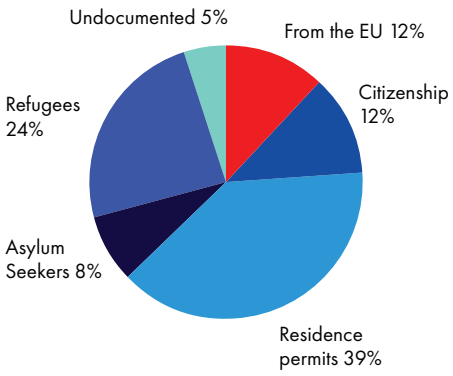
- Greece, with the organisation Red Umbrella Athens (RUA);
- Ireland, with the Sex Workers Alliance Ireland (SWAI);
- Italy, with the organisations Sex Worker Intersectional Peer Education (SWIPE), Ombre Rosse, and Comitato per i diritti Civili delle Prostitute (CdCP);
- The Netherlands, with the organisation Sex Workers Against Violence & Exploitation (SAVE);
- The United Kingdom, with the organisation English Collective of Prostitutes (ECP).

This research examines the housing challenges faced by migrant sex workers across five European countries, each characterised by distinct approaches to sex work regulation, migration policies, and housing access. This comparative framework offers a nuanced understanding of how different legal and social contexts influence the lived experiences of migrant sex workers and their ability to secure stable, adequate housing.

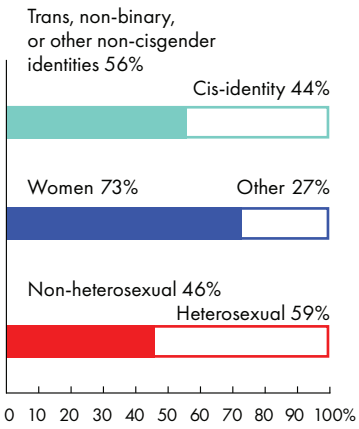
PARTICIPANTS



RESIDENCY STATUS



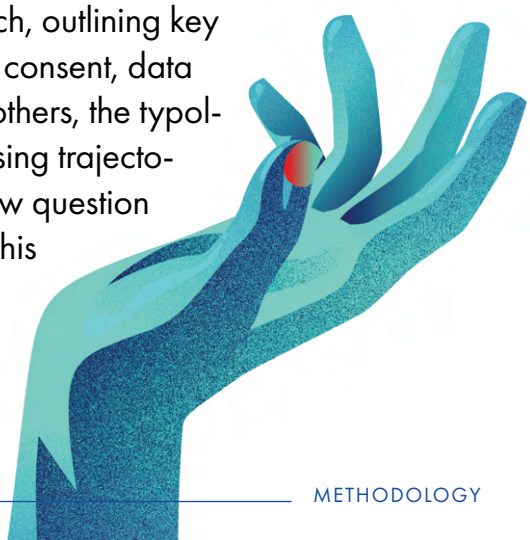
IDENTITY


Trans, non-binary, or other non-cisgender identities 56%
Cis-identity 44%
Women 73%
Other 27%
Non-heterosexual 46%
Heterosexual 59%
0 10 20 30 40 50 60 70 80 90 100%

In the context of this study, 41 sex workers were interviewed, 38 of whom were migrants (93%). Regarding residency status, the participants included: five from the EU (12%), five with citizenship (12%), 16 with residence permits (39%) — in several cases conditioned on employment or student status, three asylum seekers (8%), 10 refugees (24%), and two individuals who were undocumented (5%).

Among the participants, 23 self-identified as trans, non-binary, or held other non-cisgender identities (56%), 30 identified as women (73%), and 19 identified as non-heterosexual (46%).

All participants took part in semi-structured interviews that followed a standardised format across all focus countries. They were provided with an informed consent form explaining what information and data would be collected and why. Participants' names were anonymised to ensure confidentiality and prevent potential harm. They were also informed of their right to end the interview at any time and withdraw any responses already made. All respondents were remunerated for their time and invaluable insights into the topic. In addition, ESWA provided a research guide to the organisations involved in the research, outlining key elements of ethical research practices, including informed consent, data protection, and ethics. Topics explored included, among others, the typology of sex work in which participants engaged, their housing trajectories, and the challenges they faced. Although one interview question addressed drug use, this topic is not explored in depth in this report because few participants reported such use, and it was not consistently linked to their housing situation.



EMPIRICAL EVIDENCE FROM THE RESEARCH

Greece

As previously noted, Greece employs a system of partial criminalisation of sex work, imposing restrictive and often difficult-to-obtain requirements on migrant sex workers. **These regulations frequently force sex workers to operate in remote areas, far from urban centres, isolated from colleagues, and distanced from essential services. Such conditions exacerbate their vulnerability, increasing both safety risks and the likelihood of homelessness.** This legal framework disproportionately impacts migrant sex workers. The licensing system requires individuals to possess national identity documents or valid residency permits, effectively barring undocumented migrants and asylum seekers from legal participation in sex work. According to Red Umbrella Athens, this bureaucratic system is intentionally convoluted, leaving migrant sex workers in a constant state of precarity and uncertainty.

G., a migrant sex worker who arrived from Istanbul, recounted his early years in Greece:

> ***"[Bringing clients home] isn't legal but in the past I was doing that sometimes. Only in a brothel you can work legally. In an apartment I don't think that it is legal to work, unless it needs a different licence that I don't know about, but I don't think so."***
> ***— G., Greece***

According to Red Umbrella Athens, most of the refugees and migrant people they support are unable to work in brothels, either because they do not feel safe or due to a lack of connections. Some resort to renting temporary accommodations, such as Airbnbs, on a daily basis.

To work many turn to online platforms, engaging in sex work via webcams or by connecting with clients through various websites. Often, they conduct their work from their homes — or rather, as J. put it, "the places they are sleeping in".

J., who travelled from Cuba through Russia, Serbia, and North Macedonia before reaching Greece, described how precarious housing conditions shape the realities of migrant sex workers, forcing them to navigate both legal and personal insecurity in their daily lives.

> ***"Sometimes I do online work, not pornography but rather streaming, and then also at my place. It's neither my home nor a typical rental apartment; it's an Airbnb"***
> **— J., Greece**

In Greece, securing a housing contract requires proper documentation, a requirement that also applies to refugees. Consequently, migrant sex workers often endure prolonged periods without stable housing — or, in some cases, without any housing at all. This lack of legal standing for their work places them in a legally precarious position which can lead to arrest and even deportation. Furthermore, the lack of formal tenancy agreements leaves them vulnerable to exploitation, eviction, and precarious living conditions, exacerbating their social and economic marginalisation.

> ***"I would like to have stable housing, with a monthly rent, you understand? Since I don't have papers, I can't get anything, sign anything, nothing… [...] Housing is one of the hardest parts [of my life] to be honest. [...] If I had papers, maybe I could sign a lease and have more permanent housing. But without papers, landlords don't want to rent [to you]."***
> ***— J., Greece***

Several migrant sex workers find temporary shelter with friends or family, though this situation remains unstable, and it can be detrimental to their self-esteem and sense of agency. N. explained: "I am an independent person; I don't ask for help, I want to do everything myself. I never talk or express my pain, so I manage on my own. I solve all my problems myself."

These temporary housing arrangements are often unstable and unsafe, and they can alternate with periods of homelessness. G., for example, describes navigating between living on the streets and staying at her mother's place, where she faced severe conflicts with the neighbourhood, particularly with a bar on the ground floor, which she characterised as a dangerous organisation that was run by a terrorist. In N.'s case, the labour office sent her to an island five hours away from Athens for a job, where she had to find alternative housing solutions. N. ended up living in extremely degrading conditions in the home of a landlord who had installed cameras everywhere, including in her room:

> ***"The next day, he watched the video and laughed. I was sleeping on the floor, just in my underwear, and he was laughing until I realised he had a small camera in the room."***
> ***— N., Greece***

Such precarious living situations, frequently experienced by migrant sex workers, not only hinder access to stable housing but also compromise their safety, increasing their exposure to assault or even life-threatening situations.

In some cases, migrant sex workers are compelled to accept shelter from clients in exchange for sexual services or to use drugs with them as a means of securing a place to sleep. J. recounted his struggle with this reality: "I am someone who doesn't want to rely on drugs or that kind of life. What I want is a stable job so that I can move forward and leave all of this behind."

Greece's unprecedented housing crisis has exacerbated these challenges, enabling unscrupulous landlords to impose arbitrary rent increases and exploit vulnerable tenants. Migrant sex workers report paying as much as €1,800 per month in cities such as Athens — an exorbitant amount compared to the national average of approximately €400 per month for a 1-bedroom apartment. In absence of proper documentation, migrant sex workers are often forced to take on more clients just to afford their rent and avoid eviction or homelessness. These pressures significantly impact their mental health, as J. described: "I used to stay in multiple Airbnbs alone, but... it was too expensive. Since I didn't want to work every day, I had anxiety because of this situation."

The default stigmatising association between being a trans migrant woman and engaging in sex work also plays a significant role in eviction practices targeting sex workers. A., a transgender woman, described her experience: "If I rent an Airbnb and they realise that I am transgender, they make the connection of me using the house to do sex work so they won't allow it."

Specialised services intended to facilitate housing access for the most vulnerable populations, including social housing programs where available, often fail to meet the needs of migrant sex workers. Several participants in the study mentioned the bureaucratic complexity of administrative procedures, as well as the significant difficulties in securing affordable housing options for asylum seekers. Additionally, the financial assistance available to migrants remains far too low relative to the cost of living in Greece, leaving many in precarious and unstable conditions. The housing and reception conditions for migrants are often harsh and neglectful, even degrading.

Ireland

Ireland operates under a neo-abolitionist model — commonly referred to as the Swedish or the end-demand model — implemented since 2017. This approach, largely influenced by carceral and radical feminist narratives, frames all sex work as a form of gender-based violence and primarily seeks to criminalise the purchase of sexual services. This is compounded by Ireland's past of institutionalising 'fallen women'. As previously mentioned, this legislation builds upon the existing framework established by the Criminal Law (Sexual Offenses) Act of 1993.

The introduction of the 2017 Criminal Law Act has a direct and profound impact on migrant sex workers, who are often forced to work in environments where sex work is managed illegally. This heightened criminalisation exposes them to increased exploitation and threats, further exacerbating their vulnerability.

> ***"...we're not guaranteed any rights to sick days, we're not guaranteed any money, and yet... they [the managers] just have a lot of little methods that they use to control our behaviour and to kind of make it clear to us that, yeah, they're the ones who get to call the shots."***
> ***— F., Ireland***

According to the Sex Workers Alliance Ireland, 75% of migrant sex workers in Ireland appear to be working independently; however, securing housing requires proof of a stable income, typically through official employment. Furthermore, for migrants — particularly those who are undocumented — **accessing formal employment and registering as workers under European laws remains a significant challenge, if not impossible**. F. related: "I had done very different work back [home] and didn't feel like I could sustain that work anymore." Even when migrants secure jobs, they are often paid lower wages than the market standard, as S. explained: "I don't have any skills for the job market necessarily that would qualify me for any well-paid job, so it just seemed like the only possibility..."

As a result, sex work may become a necessary means of earning an income to cover basic needs, yet this work does not provide migrants with the official documentation required to secure a rental contract on the regular housing market — thus, they enter into a vicious cycle. **This situation is exacerbated by the current unprecedented housing crisis in Ireland.** The influx of multinational corporations — attracted by the country's favourable tax policies — has led to a surge of high-earning expatriates who can afford most of the available housing. In this climate, the issue is no longer whether housing is expensive, but when it will become available, as the market is completely saturated.

This crisis reinforces and exacerbates a class-based hierarchy among migrants. On one hand, highly skilled, affluent workers employed by multinational companies drive up housing demand and prices. On the other hand, low-skilled migrants, unable to meet landlords' strict financial requirements, are further marginalised within (and through) the housing market itself. In this way, landlords engage in a selection process between "good" and "bad" tenants, compelling many migrants to navigate a system designed to exclude them and to perform in ways that align with market expectations (Power and Gillon, 2020).

> ***"I have no paperwork to make me look like I'm a good tenant, so [I] either have to fake everything and lie about it, which is stressful in its own way... [...] or I'm just not going to be any viable option to anybody. Who would want to take me, you know? And then maybe if people find out this while I do sex [work]"***
> ***— S., Ireland***

Trans people face even greater challenges than other migrant sex workers in navigating an increasingly unaffordable and saturated housing market. **As a result, some are forced to live on the streets or in squats — spaces they describe as particularly unsuitable for trans individuals due to pervasive sexism and classism.** These conditions not only create severe hardships, such as the lack of access to running water, functioning toilets, or showers, but also contribute to heightened mental health risks. Additionally, several migrant sex workers interviewed highlighted the widespread presence of drugs in squats, further exposing them to risks of violence, drug abuse, or addiction.

Amid this context, some migrant sex workers have reported that they resort to relying on help from clients to secure housing and cover basic living expenses. Given the underlying vulnerability surrounding to these arrangements, such dependence directly impacts their autonomy and well-being.

To further complicate this picture, **access to social housing and social assistance is often contingent upon demonstrating a low income, which paradoxically excludes many migrant sex workers from these resources**, as they cannot possibly demonstrate any income at all. Furthermore, even when accessible, social housing frequently presents numerous risks and harmful conditions that fail to meaningfully improve migrant sex workers' living standards or well-being. All migrant sex workers interviewed who had relied on social or emergency housing reported similar unacceptable living conditions, including the absence of electricity, toilets, showers, or even basic bucket-flush systems, as well as a lack of running water. Overcrowding, privacy violations due to shared living spaces, and inadequate accommodations — often too small for the number of occupants — were also common concerns. Beyond the insufficient housing conditions, several migrant sex workers interviewed in

Ireland specifically highlighted experiences of mistreatment and a general disregard for their concerns, leaving them feeling abandoned and dehumanised. Many reported that these environments were marked by prevalent issues related to addiction and mental health crises.

> ***"I went to the council and I said, 'I don't have any place. I need a hostel'. And they said, 'We don't have a place'. I was going to them every day and they would call the security or take me out. So, it was hard... they sent me to a hostel where everybody was a drug addict and [had] mental health issues. And I went there and I just left [...] because I can't live here. There were no doors on the toilets. Like, it was no door it was like, just like curtains."***
>
> ***— J., Ireland***

> ***"...they never do repairs. Like my bathtub is broken... like mould coming back in my bedroom. I'll email them about it. It's coming from the stairwell, but they're not gonna do anything about it... People have been breaking in and they're blaming it on the tenants, and they're threatening to evict entire apartments if people don't close the very broken gate properly."***
>
> ***— F., Ireland***

The precarious housing options available to migrant sex workers often leave them vulnerable to sudden eviction, with no prior notice or legal protection. Many are forced to relocate frequently, depriving them of stability and security. Several study participants also emphasised the **challenges of maintaining solidarity networks among precarious individuals residing in social housing**. Those benefitting from such housing are often unable to offer shelter to others without risking eviction for subletting. Furthermore, the Swedish model exacerbates this issue by criminalising any form of mutual support among sex workers, framing it as pimping or the facilitation of sex work. Anti-trafficking raids and rescue operations often result in evictions, especially if there are no indications of human trafficking. Under this legal framework, sex workers who share accommodation for safety, work together for mutual protection, or assist one another in practical ways risk being prosecuted. The criminalisation of brothel keeping and the anti-trafficking sting operations in Ireland disproportionately impact migrant sex workers, rather than targeting traffickers or criminal organisations as purportedly intended. Many sex workers, particularly migrants, are prosecuted simply for (living and) working together for safety, without any evidence of coercion or exploitation. The case of L. is illuminating. Because of being a sex worker, a foreigner, and in a relationship with a trans person, the neighbours began to harass them and called the police. A search was carried out, mainly on suspicion of trafficking, but nothing was found. A police officer continued to harass, intimidate, and threaten L. until their eventual eviction. This happened at a time when L. was on good terms with the landlord and about to renew their contract.

> ***"I did eventually go to [the] Ombudsman [independent authority investigating complaints against public services] about it. And the Ombudsman did find a case against him but [had] no power to do anything... It was really horrible. And I was very horribly kicked out of my space when I did nothing wrong, and it was all just basically because sex work [is] so stigmatised... It was very, I mean, it was a very, very tough thing... It was really terrible... The dungeon got closed, there was the expense of getting rid of the dungeon, I grieved for quite a bit."***
> ***— L., Ireland***

In practice, this Criminal Law (Sexual Offenses) Act results in homelessness and exposes migrant sex workers to violence at the hands of exploitative third parties and human traffickers.

The law also forces sex workers into isolated and riskier working conditions, as they are trying to hide from police and the public. This makes them more vulnerable to violence and exploitation and less able to report crimes, thereby undermining their basic safety strategies.

The stigma surrounding sex workers — particularly those who are migrants, people of colour, members of the LGBTQIA+ community, or drug users — creates additional and significant barriers to securing safe and stable housing. Migrant sex workers who operate from their homes, often without the knowledge of their landlords or neighbours, must take extensive measures to conceal their activities to avoid jeopardising their housing security while simultaneously ensuring their own safety. Because the presence of multiple male visitors is often automatically interpreted as evidence of engaging in sex work — as reported by N., R., and L. — migrant sex workers frequently face eviction, sometimes without prior notice and under dire conditions. This is a result of the Swedish law in which the landlords who rent to sex workers can face prosecution under the provisions 'living on the earnings of prostitution' and brothel keeping. While the authorities rarely prosecute landlords directly, they often warn them of potential legal consequences, leading to landlords evicting tenants to avoid liability. Many also recount experiencing mistreatment not only from landlords but also from law enforcement officers, who, despite their role in protecting against unlawful evictions, often fail to offer adequate support. In summary, this law creates a chilling effect where migrants, women of colour, and trans people face increased stigmatisation as landlords — fearing legal repercussions — may be reluctant to rent to anyone they suspect of being a sex worker, thereby further marginalising already vulnerable groups.

Italy

In Italy, sex work remains largely unregulated, but most activities associated with the sale of sexual services — such as aiding, exploiting, and abetting — are criminalised. Ever since Italy saw the number of immigrants surpass that of emigrants in the 1970s, the country has undergone significant demographic changes. This shift has led to an increased focus on border fortification and the rise of nationalist politics, where the criminalisation of migrants functions both as a rhetorical tool and a concrete political practice. Over time, this discourse has gained traction, leveraging narratives of an alleged "invasion" to justify restrictive policies and encourage racist behaviours at both the institutional and the individual level. **Overall, migrant sex workers experience profound housing insecurity rooted in racism and transphobia and manifesting across multiple levels.** This includes outright denial of housing, inflated rental prices, exposure to explicit violence, exclusion due to formal requirements, substandard living conditions, and other systemic barriers that reinforce their precarity.

The majority of migrant sex workers interviewed for this study originate from Latin American countries, with others coming from Eastern Europe and China, and all began sex work after arriving in Italy. **Many face significant barriers to housing due to intersectional discrimination.** As highlighted in interviews with L., V., G., and others, being both a migrant and a trans person exacerbates these challenges. In Italy, trans women are often directly associated with sex work, severely limiting their access to stable housing.

> ***"I have always had difficulties finding a house. I went to several real estate agencies, and the first problem was being trans. Second, being Black. Third, being a foreigner. Fourth, not having 'administrative security' — an employment contract."***
> ***— A., Italy***

Italy's housing market is dominated by private property ownership, creating a significant power imbalance between landlords and tenants. This disparity is further reinforced by the absence of effective policies to protect renters. Formal rental agreements require extensive documentation, including proof of stable income, a valid residence permit, and financial guarantors — forcing prospective tenants to "perform" as ideal renters. **Migrant sex workers, already stigmatised through racialised and moralised narratives, face exclusion not only due to unaffordable prices but also through discriminatory profiling by landlords.** Unable to meet formal requirements, many are pushed towards an informal and precarious housing market. As L. described: "I consider myself homeless because I change residence every week. I don't have a home of my own.

I don't have a house to rent because I can't find a home." Even when migrant sex workers manage to secure housing — whether illegal or not — they must hide their engagement in sex work, as they risk eviction if discovered.

The situation has worsened in recent years, due to the sharp increase in short-term rental agreements, particularly driven by tourism-related gentrification. This trend has inflated rental prices, intensified competition, and further destabilised access to long-term housing. **The informal rental market remains the only option for many excluded populations**, and it is frequently marked by exploitation, inflated prices, overcrowding, uncertainty, inadequate conditions, and violence. As G. and L., who are originally from China, said as racialised people: "It is increasingly difficult to find a house to rent, regardless of the work we do."

> ***"We, as transsexuals, do not have a contract, we do not have a paycheck from work. ...thus a landlord can easily profit from us. It's [already] a lot for normal families that work and pay taxes, but they would never [have to] pay that amount [which trans people have to pay]. It is absurd. But I have no other choice. Without a paycheck or a steady job I cannot have a house paying less than this."***
> ***— B., Italy***

If landlords become aware of their engagement in sex work, they may not only increase the rent but impose additional charges specifically for the use of the space for work, reinforcing a mechanism of both economic and personal control. Respondent L commented, "I spend a lot on the house every week — 70% of my earnings." Or, as F. reported: "For each client I bring, I have to give 20 euros. 20 euros an hour for the room."

Many landlords do not hesitate to engage in harassment, threats, or even violence, knowing that migrant sex workers often lack the legal protections or alternative housing options to resist. The risk of eviction is constant, sometimes occurring without notice, leaving them with no time to secure another place to stay. **For many sex workers fear was one of the first sentiments when it comes to housing.**

> ***"It happened that an Italian client acted as an intermediary to make an appointment for a foreign friend, who then turned out to be a thief, stealing money from the house and hurting the girls. We didn't want to call the police because of the document issue [one of their colleagues was undocumented], because of the language barrier, and to avoid creating problems with the owner of the house."***
> ***— G. and L., Italy***

Faced with such precarity, migrant sex workers often endure substandard living conditions, including broken or non-functional bathrooms, no access to hot water, and even a lack of electricity.

> ***"How is it possible that the bathroom is so decaying, that there is no electricity? Four days without taking a shower, we had to heat the water in the kitchen."***
> ***— E. and L., Italy***

Overcrowding is another major issue, with some forced to share small studio apartments with as many as fifteen people, eliminating any sense of privacy or security.

Some migrant sex workers explained that, due to their immigration status, they are unable to obtain legal residency on their own and therefore forced to rely on third parties and intermediaries who, in exchange for payment, either act as guarantors or use their broader networks to secure a housing address where sex workers can be legally registered. Even when migrant sex workers manage to secure housing in the formal market, they must conceal their engagement in sex work to avoid eviction — not because of legal restrictions but due to widespread stigma. To maintain their housing, they must hide their activities and carefully monitor their behaviour, fearing exposure to violence or being reported by neighbours or landlords.

In cases of evictions, many reported being forcibly removed without warning or losing the deposit they initially paid. Some had also faced theft, threats, insults, or physical assaults from neighbours or clients. **The situation is made even worse by the criminalisation of solidarity.** As noted before, in Italy, two or more sex workers sharing and working in the same apartment can also be accused of exploitation, effectively pitting them against each other and undermining mutual support networks while increasing isolation.

To secure somewhat stable housing, many migrant sex workers turn to clients with whom they feel they have a good relationship. While this form of 'solidarity' may temporarily provide relief and shelter, it remains highly precarious and forces them to maintain positive relations with clients, reinforcing a power dynamic where their most basic needs — such as housing — are dependent on those who purchase their services, thus decreasing sex workers' contractual power. Despite these vulnerabilities, most migrant sex workers emphasised their efforts to avoid engaging in sexual relations in exchange for housing, striving to maintain their autonomy and separate work from their living situation.

The housing struggles of migrant sex workers in Italy endure within the shelter system for homeless individuals, which remains highly inadequate, prompting displacement measures. Of all the interviewees, only one sex worker — A., originally from Serbia — was a tenant in social housing, though the conditions were deplorable,

"such as mould on the walls". Despite this, it was a significant improvement compared to the homeless shelter where she had previously stayed, run jointly by public and religious associations. Due to her trans identity, she was evicted from the shelter after deciding to stop leading a double life and going to breakfast as a woman.

> ***"After five minutes they called me into the office for a talk where they told me: 'This is a centre where we host the people we help, but here, as you can see, there are many Muslims and we cannot accept a person like you because you are either a prostitute or a trans, or something of that sort. Isn't it?' For them it wasn't good to have a person like me in that place."***
> ***— A., Italy***

Netherlands

The Netherlands holds particular significance as one of the few European countries with a regulatory approach to sex work, alongside Germany and Switzerland, for example. In 2000, the country decriminalised the organisation of sex work among consenting adults over 18 by removing related offenses from the Criminal Code. Regulation was instead delegated to municipalities, allowing local authorities to decide whether to oversee sex work. **Most opted for strict licensing systems that impose complex conditions, making sex work increasingly difficult to practice — particularly for migrant sex workers, for whom the rules are often unclear.** As K. explained: "I think they've changed that rule about you having to have a premises license to host at home, so I think it wouldn't be illegal."

P.'s testimony was also indicative of a lack of clarity:

> ***"I know that it's officially not legal to do in-calls, and I know of people who have had trouble doing it. I think outcalls are perfectly fine, but in-calls can be problematic. So I rarely do in-calls except with people I already know and trust, especially because living in social housing, you shouldn't do it unless you have a license."***
> ***— P., Netherlands***

It is also crucial to note that under the Migrant Workers Act of 1995, migrant workers cannot obtain a work permit for sex work. As a result, **migrant sex workers are forced to operate illegally to sustain their livelihood, often by receiving clients in their homes — a practice that is prohibited in most Dutch cities**. In Amsterdam, for example, the municipality sends undercover "mystery guests" to entrap sex workers, leading to

evictions. Additionally, the city provides landlords with resources on its website to help them identify and avoid renting to potential sex workers, while simultaneously reducing the number of licensed brothels. **This forces migrant sex workers to relocate to unauthorised, less safe, and unstable workspaces, often further from city centres.** This increased precariousness impacts workers directly, as P. explained: "I need to be around Amsterdam, not too far away, because otherwise, who's gonna pay for the train [to commute]?"

Similarly, K. described their unstable housing situation:

> ***"It's not squatting because I have permission, but I guess it's kind of [like being] homeless because I don't have anywhere to officially register as a resident, even though I'm really living there."***
> ***— K., Netherlands***

Several participants, including K., P., and M., have experienced homelessness due to their inability to secure stable, long-term housing. The fear of becoming homeless is constant for migrant sex workers, who are acutely aware of how their situation exposes them to this risk. Almost all participant reported how their landlords explicitly prohibit sex work in their properties, as H. explained: "It's very clearly stated in the contract" that sex work is forbidden.

These restrictions, combined with unstable housing conditions, place a significant mental and emotional burden on migrant sex workers, increasing daily stress and uncertainty.

Some participants reported securing housing through romantic relationships or subletting. These **informal arrangements** — whether sexual in nature or involving clients — **can serve as temporary solutions to avoid homelessness, but they signal a relationship of economic exploitation**. Additionally, they rarely allow migrant sex workers to register their addresses, obtain a personal public service number (BSN), or access their rights in the Netherlands. As M-A. explained:

> ***"Well, I pay 100 euros per day. It's not much, relatively speaking, but it depends. Let me explain so you can understand. There are times when I make good money, and other times when I don't. For example, right now, I'm struggling — I have to pay 700 euros this week, and work is tough. It's really difficult."***
> ***— M-A, Netherlands***

The ongoing housing crisis in the Netherlands has further reduced access to accommodation, let alone decent housing. Migrant sex workers are particularly affected, facing compounded stigma due to their profession, race, gender identity, and immigration status. As a result, many endure unsafe and violent living conditions. This was the case for P., whose co-tenant and landlord discovered his trans identity and sex work activity: "This person

was offensive to me, but I live in Amsterdam, you know, you don't find a house anytime soon. So you have to tolerate this offensive behaviour."

All participants described the need to constantly move due to housing difficulties and considered themselves effectively homeless, lacking any form of stable residence. Many reported cycling through shelters, squats, and temporary arrangements with friends. K., for example, had to move eleven times in the past five years. For many, sex work remains a necessary means to maintain housing and meet basic needs.

Although the Netherlands has legal protections against eviction and housing discrimination, social services and housing assistance programs appear largely ineffective for migrant sex workers. In P.'s case, after experiencing violence from his co-tenant and landlord due to his trans identity, sex work, and race, he was unable to access support from victim assistance organisations or find suitable temporary or permanent housing, despite the circumstances. As he recalled:

> ***"I reached out to all the organisations, including domestic violence organisations [...]. But because I was not in a relationship situation, they told me, 'It's not family, it's not a partner, it's not a boyfriend or anything, so we can't help.'"***
> ***— P., Netherlands***

United Kingdom

The United Kingdom enforces a system of partial criminalisation through various laws dating back to 1956, most notably the Sexual Offences Act 2003. While sex work itself is not illegal, the law criminalises all forms of advertising, soliciting, and organising sex work — even among sex workers themselves. These legal restrictions have a direct impact on sex workers, limiting their ability to access stable housing and maintain their well-being. **They are often unable to rent apartments or live together without risking prosecution for organising sex work, even if they do not work from their homes but are simply identified as sex workers.** This disproportionately affects transgender women, migrants, and women of colour, such as L., a trans woman from Colombia:

> ***"A neighbour reports us for revenge, I think [...]. He is always making offensive jokes to us, and then he comes to the door to ask for sex and we say no, because he has been offensive and also, he was high when he comes to the door, but he's friends with the landlord, so he reports to him that we are prostitutes. I think he is racist and transphobic also, to be honest."***
> ***— L., UK***

All participants in this study stated that their engagement in sex work was directly linked to their housing insecurity. Many cited the high cost of living, including rent, as a primary factor, while others highlighted the requirement to pay large sums upfront to secure a tenancy — an issue that disproportionately affects single mothers.

The ongoing housing crisis in the UK has significantly reduced the availability of rental accommodations, driving up prices as demand far outstrips supply. Several sex workers interviewed reported having to pay over £1,000 per week due to their inability to provide a work contract, references, deposit, or credit history. Given their diverse circumstances — including migration status, gender identity, and professional standing — migrant sex workers face significant barriers to securing stable housing. M., for example, shared:

> ***"I couldn't pay my rent because I couldn't work and I couldn't get any help as a sex worker from the government. So the landlord tried to get rid of me and evict me and threatened me and harassed me."***
> ***— M., UK***

For those receiving state benefits, securing private rental accommodation is nearly impossible, as Mi. explained:

> ***"It's impossible to go on private rent, because I'm on benefits. And I don't have savings. And they don't take you [...]. They don't tell you to your face because it's illegal. But you can see that all the conversation is changing when you tell them you are on benefits."***
> ***— Mi., UK***

Thus, although sex work is often a strategy to be able to pay for housing, the stigma surrounding it, along with its typically informal or outright illegal nature, makes it extremely challenging to secure conventional housing solutions at a fair price. Even when migrant sex workers manage to secure accommodation, paying exorbitant rent does not necessarily guarantee liveable conditions. In addition to high rents, the cost of essential utilities — such as water, electricity, and gas — has surged in recent years due to successive crises, including the COVID-19 pandemic and the war in Ukraine. Some landlords exploit this situation, charging tenants extortionate rates for basic necessities. J., for example, reported being charged £1.50 for every (quick) shower he took. L. further explained:

> ***"We are paying a lot for the rent, but the space is not luxurious, the conditions are very bad, to be honest with you. Like the heat is never working and there are bad walls. The black mould on the walls is bad, which is a bad situation for my health. It is a small space and there is no kitchen, it's just a small area with a microwave and a small fridge, so there is no cooker."***
> ***— L., UK***

Migrant sex workers are also at constant risk of eviction, forcing them to choose between enduring degrading living conditions or facing violence from landlords who exploit their precarious situation. The majority of participants in the study reported experiencing physical or verbal abuse, intimidation, and threats from their landlords. M.'s landlord, for example, resorted to extreme measures to remove her:

> ***"I had this huge problem with a very aggressive landlord [...]. He was very violent. It was very traumatising for me and my friend. We started to look on the internet for support. [...] How I could find help? How I could find someone who could help us? [...] The government doesn't help, government that wants us to pay tax."***
> ***— M., UK***

These precarious housing situations also limit migrant sex workers' ability to properly screen clients, further exposing them to violence. J. highlighted the dangers of rape and theft experienced by several of her colleagues, the resulting constant stress, and the fear of being killed.

Access to social housing and assistance is often restricted based on income levels, making it difficult for migrant sex workers to qualify for support. Even when they do, social accommodations frequently present unsafe or substandard conditions that do little to improve their well-being. The criminalisation of sex work is deeply intertwined with housing insecurity, eviction threats, and violence. **Every participant who spoke to the English Collective of Prostitutes emphasised that decriminalisation is essential — not only to access housing support but also to gain the power to contest inadequate living conditions and fight against exploitation.**

FORMS OF ENDURANCE, SOLIDARITY, AND GOOD PRACTICES

Despite the numerous challenges that migrant sex workers face in securing safe and stable housing, alternative solutions have emerged. To navigate systemic exclusion, many rely on informal solidarity networks — for example, family or friends offering housing, at least temporarily, upon arrival. Others turn to intermediaries who connect them with supportive landlords or offer assistance out of altruism.

> ***"She talked to him [a landlord] about my situation, so when she left, he let me rent it. He understood my situation. He actually rented me the house more because of my life situation, so I see it as him helping me. Because he knew my situation, so he was like, 'I can help you, no problem, just don't bring me any trouble.'"***
> ***— A., Greece***

In response to systemic exclusion, migrant sex workers often build their own support networks. These informal arrangements are especially common among trans migrant sex workers, who frequently face heightened levels of discrimination. While not always legally recognised or formally organised, these community-led solutions demonstrate resilience and the value of mutual aid.

> ***"Among trans women we are very united in this sense, we help each other... if we know each other, we become familiar and we pass on information, saying, 'Look, I know that there is a place where you can go', that is good, and we exchange it. This is a beautiful thing that I found in Italy."***
> ***— S., Italy***

> ***"We were obligated to live together. We were not friends, and even if we didn't like each other, we had no choice. But we helped each other because, at the end of the day, we were in the same situation. It was an escape valve from all the difficulties, so we created bonds."***
> ***— A., Greece***

> ***"We have a group of girls — only working girls — who always try to help and support each other. When someone doesn't have a place to stay because the landlord throws them on the street, we step in. That's what saved me."***
> ***— J., UK***

The existence of these mutual aid networks across Europe highlights the shortcomings of mainstream housing systems and underscores the resilience of affected individuals. These networks aim to mitigate risks such as homelessness, substandard living conditions, eviction, and violence — whether perpetrated by landlords, neighbours, or the police, who are identified as significant sources of threat and injustice (ESWA, 2024).
In the absence of state support, grassroots initiatives have emerged to address the housing crisis among migrant sex workers. Examples can be found globally. In Turkey, İstanbul LGBTİ's Trans Misafirhanesi [Guesthouse] established a community housing project for trans people, providing temporary accommodation in response to the state's failure to offer viable housing options (PostSeyyah, 2017). In Brazil, Coletivo Clã das Lobas created the 'Together We Are Stronger' fund during the COVID-19 pandemic, after the mass closure of hotels left many sex workers homeless. In addition,the NGO Aprosmig negotiated with hotel owners to provide hotel rooms for sex workers. This initiative secured a temporary housing facility with mattresses and bedding, though essential needs such as food, hygiene products, and cleaning supplies remained unmet (Vakinha, 2020). In Mexico, two sex workers helped establish one of the first shelters for elderly or retired sex workers facing economic hardship (Desrus & Gómez Ramos, 2014).

Sex worker-led organisations also play a crucial role in defending housing rights and preventing evictions.

> ***"After my landlord said he was selling the house, I contacted the council right away. I got the confirmation letter months later — six months. I wrote to the MP with help from Legal Action for Women, and they answered faster, but nothing changed. Still no housing."***
> ***— Mi., UK***

> ***"I got support from ECP to stop the eviction, and they connected me with Legal Action for Women, who found me a lawyer. They also organised protests against the letting agent and contacted the housing group. The housing group confirmed that my landlord was evicting me illegally because it was during lockdown when evictions were banned. That really helped me."***
> ***— M., UK***

While state services designed to assist with housing disputes often fail migrant sex workers, some positive examples of good practice can still be identified. For example, the Housing First approach serves as a valuable model for designing policies that provide stable accommodation. Its core principle is a reversal of traditional homelessness policies: instead of treating housing as a reward for completing rehabilitation, integration, or treatment programs, it recognises housing as an inalienable human right. Stable housing becomes the starting point — not the outcome — of social reintegration.

Initially developed for populations such as individuals experiencing homelessness who use drugs or have mental health issues, Housing First operates on key principles, including harm reduction and the separation of housing provision from social support services. This ensures that individuals do not risk losing both simultaneously. **However, while Housing First provides a valuable framework, it should not be regarded as a one-size-fits-all solution. Instead, it must be adapted to local contexts, as different experiences of homelessness present distinct challenges** (Lancione *et al.*, 2018).

Several key factors influence the effectiveness of initiatives aimed at addressing homelessness — factors that can also act as barriers to their successful implementation (McNaughton & Sanders, 2007), including:

- **Access to Social Welfare Systems** — As discussed in the previous chapter, access to social welfare systems remains limited or highly problematic in all countries covered by this study.

- **Social Networks and Isolation** — Supportive networks play a crucial role in helping individuals transition out of homelessness. Strong social connections can provide emotional support, practical assistance, and opportunities for stability. In contrast, prolonged isolation or continued exposure to harmful environments can reinforce vulnerabilities and hinder the process of breaking the cycle of homelessness.

- **Housing Stability** — Securing permanent, safe, and affordable housing is essential for successful reintegration, aligning with the core principles of Housing First.

CONCLUSION

Sex work is intrinsically linked to access to housing. Many respondents in this study engaged in sex work as a result of housing insecurity, which is especially dire for migrants. The high cost of living, including rent as a primary factor, the need to pay large sums upfront to secure a tenancy, all lead to sex work as a strategy to pay for housing.

Migrant sex workers face persistent stigmatisation and discrimination across Europe. Beyond their immigration status or how recently they arrived, factors such as racialisation, xenophobia, and transphobia further compound their marginalisation. This is especially evident in the heightened discrimination faced by migrant trans women. **These intersecting barriers, coupled with deeply entrenched societal prejudices, make securing housing — let alone dignified living conditions — extremely difficult, if not impossible.**

Although the countries examined in this study differ in their legislative approaches to sex work and migration patterns, **migrant sex workers share common struggles**. While the specific obstacles to housing security vary by context, a broader pattern emerges. Regardless of the legal framework, migrant sex workers are forced into precarious mobility, with many describing a constant state of homelessness — even when they have temporary shelter.

Due to severe housing barriers, migrant sex workers are often pushed into unsafe and undignified living conditions, exacerbated by housing crises affecting multiple European countries. The constant risk of eviction — and, consequently, homelessness — forces them to accept exorbitantly high rents which can amount to exploitation, endure sexual harassment from landlords, suffer verbal and physical abuse from neighbours, and face violence from the police who fail to protect them even in cases of blatant mistreatment.

Despite differences in public housing policies and shelter assistance across European countries, **available support remains inadequate and,** in some cases, **outright dehumanisin**g. This reinforces material and symbolic discrimination against and stigmatisation of migrant sex workers. Even in countries like the Netherlands, where sex work is legally recognised as labour, housing conditions remain harsh due to additional layers of control that undermine sex workers' well-being.

Substandard housing, overcrowding, and overpricing are the norm rather than the exception. This reality stands in stark contrast to international, European, and national guidelines for housing, which establish minimum standards — such as access to electricity, potable water, hygiene facilities, functional toilets, and overall health and well-being as defined by the World Health Organization. In the case of migrant sex

workers, these legal and human rights standards are systematically violated.

These challenges are directly linked to national policies on sex work. Restrictive legal frameworks — whether through client criminalisation, criminalisation of third parties (anyone profiting from the prostitution of others, including those providing housing, protection, transport, etc.), or strict regulation — exacerbate migrant sex workers' economic vulnerability and isolation, worsening their living conditions. **The inability to provide proof of income or meet formal rental requirements; the legal entanglement of residency status, employment recognition, and housing rights; as well as the prohibition of obtaining residence permits through sex work, all contribute to migrant sex workers' exclusion from the housing system.**

Legal models such as the Swedish model which claim to protect sex workers — particularly the most vulnerable — have consistently failed migrant sex workers. The criminalisation of third parties (profiting from the prostitution of others) leads to state-sanctioned violence. Police often threaten landlords with prosecution under third party laws, resulting in the eviction of sex workers from their homes. However, brothel keeping laws also affect sex workers themselves, as working and living together — for their safety — often leads to the prosecution of sex workers for brothel keeping and can lead to their deportation. Similarly, regulatory frameworks often accompany the criminalisation of migrants, leaving no viable path for migrant sex workers to secure stable housing or integrate into society, thereby worsening and legitimising cultural stigma and prejudices. More broadly, the criminalisation of undocumented migrants across Europe deepens their precarity, leaving them trapped in cycles of housing instability and economic exploitation. As a result, sex work is one of the few viable alternatives to be able to pay the rent among the limited options available to migrants, especially people of colour and trans people.

Particularly painful is the criminalisation of mutual solidarity and key safety strategies for sex workers, as collective action by sex workers, such as sharing accommodation and supporting each other, could be seen as brothel keeping, soliciting, pimping, or facilitating prostitution. This further erodes opportunities for collective support and solidarity. Yet, despite these challenges, **solidarity networks have emerged across Europe**, driven by migrant sex workers themselves, sex worker-led organisations, and community-based initiatives. **These grassroots efforts remain the most effective response to the systemic exclusion they face**, demonstrating both the resilience, the resources and the expertise of affected communities.

Rather than obstructing these forms of support through a cultural framework of whorephobia and institutional distrust, governments should actively encourage and fund community-driven solutions. While housing alternatives exist across Europe — offered by service providers committed to unconditional access — these initiatives remain insufficient and lack structural integration. **The burden of survival continues to fall on migrant sex**

workers themselves, underscoring the urgent need for systemic change and the full decriminalisation of sex work.

Given the current situation, action is needed on at least three fronts:

1. **Supporting and Amplifying Community-led Initiatives** — It is crucial to engage with, and listen to, grassroots organisations that work directly with affected communities. These groups provide invaluable insights and proposals based on lived experiences, making them key actors in shaping effective policies.

2. **Advocating for Systemic Housing Reform and Sex Work Decriminalisation** — Housing should be primarily treated as a fundamental right and social good rather than an investment asset. Policies should prioritise the use value of housing, ensuring accessibility and affordability for those most at risk of exclusion. In parallel, sex work should be completely decriminalised, both for local and migrant populations.

3. **Developing Structured Support Programs for Homeless Sex Workers** — These programs should be designed in collaboration with sex workers themselves, incorporating peer support models to ensure that services are relevant, accessible, and non-stigmatising.

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RECOMMENDATIONS

1. Legal and Social Recognition

- Fully decriminalise sex work, ensuring that no groups — such as migrant sex workers — remain criminalised or excluded from legal working conditions.
- Promote public awareness campaigns and implement policy reforms to actively destigmatise sex work, migration, trans identities, and racialised communities, fostering a more inclusive and equitable society.
- Facilitate the inclusion of migrant sex workers in broader society by regularising undocumented migrants and significantly improving asylum and residency permit procedures.

2. Housing Rights and Protections

- Strengthen tenant protections to guard against illegal and violent evictions.
- Introduce rent controls to address rising rental prices and prevent excessive rent burdens.
- Expand access to affordable housing by increasing investment in social housing and implementing policies to regulate the rental market in alignment with tenants' needs.
- Tackle the broader housing crisis through measures such as:
  - Restricting landlords from leaving apartments vacant.
  - Limiting short-term and tourist-oriented rentals.
  - Promoting shared and communal ownership models.
- Establish structural housing programs specifically for migrant sex workers, ensuring sustained funding and long-term support.
- Expand support measures to address the energy crisis and combat energy poverty, ensuring that assistance is accessible not only to property owners but also to tenants — citizens and non-citizens alike. These measures should also support individuals engaged in precarious or informal labour.

3. Safe and Dignified Living Conditions

- Enable migrant sex workers to work from home or in safe, appropriate environments, including the option to work collectively in shared housing to enhance their safety and well-being.
- Improve the availability of emergency shelters for cis and trans women as well as gender non-conforming individuals. Ensure these shelters are accessible, safe, and adequate, with inclusive policies and practices that guarantee equal dignity and non-discriminatory treatment for people of all genders.
- Prohibit the criminalisation of landlords for renting to sex workers or undocumented migrants.
- Recognise housing as a fundamental right by making the eradication of homelessness a structural policy objective.
- Implement strict, binding international and European measures to hold states accountable for guaranteeing access to housing and decent living conditions.

4. Community-Led and Harm Reduction Initiatives

- Acknowledge migrant sex workers as experts in their lived experiences and ensure their active participation in shaping housing policies and securing solutions for safe and stable housing.
- Develop, sustain, and fund harm reduction programmes led by sex worker organisations to support migrant sex workers facing challenges such as substance use, sexually transmitted infections, and exposure to violence.
- Prioritise risk-reduction strategies and peer support models to mitigate and support exits from homelessness.

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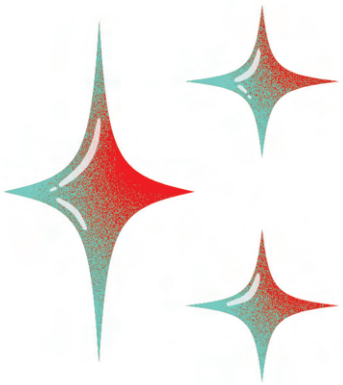

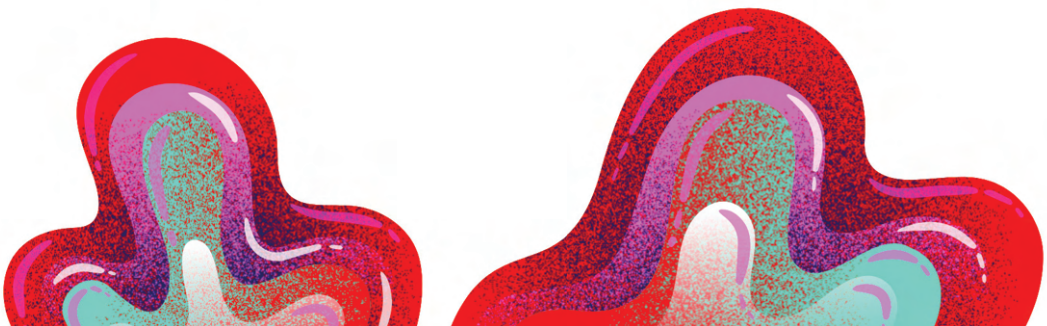

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